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Expeditors International of Washington, Inc.

Hearing Date: To Be Set

Oral Argument Requested

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

Powin, LLC, *et al.*¹,
Debtors

Chapter 11

Case No. 25-16137 (MBK)

(Jointly Administered)

TO:

HON. MICHAEL B. KAPLAN

SERVICE LIST

PLEASE TAKE NOTICE that the undersigned, attorneys for Attorneys for Applicant and Secured Creditor Expeditors International of Washington, Inc., shall apply before the Hon. Michael B. Kaplan, at the United States Bankruptcy Court for the District of New Jersey, United States Courthouse, Trenton, New Jersey, at a date and time fixed by the Court, for an Order pursuant to 11 U.S.C. §362, granting relief from the automatic stay for purposes of abandoning

¹The Debtors in these Chapter 11 Cases are: (i) Powin Project LLC; (ii) Powin, LLC; (iii) PEOS Holdings, LLC; (iv) Powin China Holdings 1, LLC; (v) Powin China Holdings 2, LLC; (vi) Charger Holdings, LLC; (vii) Powin Energy Ontario Storage, LLC; (viii) Powin Energy Operating Holdings, LLC; and (ix) Powin Energy Operating, LLC.

or liquidating certain collateral, and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 0913-2 (a) (2) any (i) opposition to this motion or (ii) cross motion must be filed and served not later than 7 days before the hearing date.

Dated: August 26, 2025

Respectfully submitted,

BRESSLER, AMERY & ROSS, P.C.
Attorneys for Movant

By: /s/ David H. Pikus
David H. Pikus